## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.

v.

Case No. 2:24-cv-00752-JRG-RSP (Lead Case) **JURY TRIAL DEMANDED** 

HP INC.

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.

v.

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.

ASKEY COMPUTER CORP., ASKEY INTERNATIONAL CORP.

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.

v.

HP INC.

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.

v.

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC.

WILUS INSTITUTE OF STANDARDS AND TECHNOLOGY INC.

v.

ASKEY COMPUTER CORP., ASKEY INTERNATIONAL CORP.

Case No. 2:24-cv-00746-JRG-RSP (Member Case)

Case No. 2:24-cv-00753-JRG-RSP (Member Case)

Case No. 2:24-cv-00764-JRG-RSP (Member Case)

Case No. 2:24-cv-00765-JRG-RSP (Member Case)

Case No. 2:24-cv-00766-JRG-RSP (Member Case)

Plaintiff Wilus Institute of Standards and Technology, Inc. ("Wilus"), respectfully moves for an extension of time in which to answer or otherwise respond to Defendants Samsung Electronics Co., Ltd. ("SEC") and Samsung Electronics America, Inc. ("SEA") (collectively, "Samsung") Response to Motion to Dismiss Amended Counterclaims 1-2. In support of this Motion, Wilus states as follows:

- 1. On May 28, 2025, Samsung filed a Response to Plaintiff's Motion to Dismiss Amended Counterclaims 1-2. (Dkt. Nos. 116, 123).
- 2. Wilus is scheduled to respond to Samsung's Response by June 5, 2025.
- 3. Plaintiff respectfully moves the Court for a 7-day extension of time through June 12, 2025 in which to respond to the Counterclaims.
- 4. Wilus believes there is good cause exists for this brief, customary extension.

Accordingly, Wilus respectfully requests that it have until **June 12, 2025** to answer or otherwise respect to Samsung's counterclaims. Counsel for Samsung confirmed that they do not oppose.

Dated: May 30, 2025 Respectfully submitted,

<u>/s/ Neil A. Rubin</u>

Marc Fenster CA State Bar No. 181067 Email: mfenster@raklaw.com Reza Mirzaie CA State Bar No. 246953 Email: rmirzaie@raklaw.com Dale Chang CA State Bar No. 248657

Email: dchang@raklaw.com Neil A. Rubin CA State Bar No. 250761 Email: nrubin@raklaw.com Jacob Buczko CA State Bar No. 269408 Email: jbuczko@raklaw.com Jonathan Ma CA State Bar No. 312773 Email: jma@raklaw.com Mackenzie Paladino NY State Bar No. 6039366 Email: mpaladino@raklaw.com RUSS AUGUST & KABAT 12424 Wilshire Blvd. 12th Floor Los Angeles, CA 90025

Telephone: 310-826-7474

## Of Counsel:

Andrea L. Fair
State Bar No. 24078488
MILLER FAIR HENRY, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)
E-mail: andrea@millerfairhenry.com

ATTORNEYS FOR PLAINTIFF, Wilus Institute of Standards and Technology Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on this 29th day of May, 2025.

/s/ Neil A. Rubin

## **CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that pursuant to Local Rule CV-7(h) counsel for Wilus has conferred with counsel for Defendants and the relief requested in this motion is unopposed.

/s/ Neil A. Rubin